REMARKS

STATUS OF THE CLAIMS

In accordance with the foregoing, the claims are presented as filed in the After Final Amendment on August 29, 2007 and claim 22 is added; thus, the pending claims 1-20 and 22 remain for reconsideration, which is respectfully requested.

No new matter has been added and accordingly, entry and approval of new claim 22 is respectfully requested.

STATUS OF THE CLAIMS:

Claims 1-20 and 22 are pending.

Claims 1-20 are rejected.

REQUEST FOR INTERVIEW:

Applicants respectfully request that the Examiner contact the undersigned to schedule an interview at the earliest convenience of the Examiner.

REJECTION OF CLAIMS 1-20 UNDER 35 U.S.C. 112, SECOND PARAGRAPH, FOR INDEFINETENESS

The Advisory Action Continuation Sheet, at page 2, lines 3-5 asserts "The use of the word 'common' such as when used in the term 'first common transaction control signals' renders the claims indefinitely since it is not clear what other element it is common to. The word is a relative word and thus it requires some kind of reference."

Applicants respectfully disagree with the assertion that there is no "reference," because claim 1, as amended in the August 29, 2007 response, recites "a parameter file storing parameters to convert said **first common transaction control signals, which are a-common type to all-each apparatus connected to said host** and specified by an interface with said host." That is, the "first common transaction control signals" are common "to each apparatus connected to said host." Accordingly, Applicants respectfully submit that claim 1 complies with the requirements of 35 U.S.C. §112, second paragraph. Withdrawal of the claim rejections is respectfully requested.

ITEMS 1-12: REJECTION OF CLAIMS 1-3, 7-11, 15-17 and 19-20 UNDER 35 U.S.C. 102(e) AS BEING ANTICIPATED BY SHIOMI ET AL. (USP 7,024,668), HEREINAFTER REFERRED TO AS "SHIOMI."

Independent claims 1, 9 and 17 are allegedly anticipated by Shiomi.

The Office Action, in Response to Arguments, at page 10, asserts "in response to applicant's argument that the references fail to show certain features of applicants invention, it is noted that the features upon which applicant relies ... are not recited in the rejected claims."

In accordance with the August 29, 2007 amendment, claim 1 is amended, taking into consideration the Examiner's comments, to recite, in part, "a plurality of I/O units **performing a financial transaction operation**; and a control unit controlling one of said plurality of I/O units according to **first common transaction control signals** from said host, and wherein said control unit comprises: a middleware layer operating according to control of a kernel and controlling one of said plurality of I/O units, a parameter file storing parameters to convert **said first common transaction control signals, which are common to each apparatus connected to said host** and specified by an interface with said host, into second transaction control signals specific to said middleware layer." Applicants respectfully submit that Shiomi fails to disclose, either expressly or inherently, the same.

The Advisory Action Continuation Sheet, at page 2, lines 12-13 asserts "the 'financial' limitation are not structurally involved in the elements of the apparatus. Therefore, the amended 'financial' limitation is deemed to be nonfunctional descriptive material."

Applicants respectfully disagree with the assertion, because claim 1, as amended in the August 29, 2007 response, recites "a plurality of I/O units **performing** ~~said~~ **a financial transaction operation** ... wherein said middleware layer specific to said apparatus controls said I/O units ~~so as to perform~~**performing** a financial transaction operation designated by said first **common** transaction **control** signals, according to said second transaction control signals." That is, Applicants respectfully disagree with the Advisory Action's assertion that the "financial transaction operation" is nonfunctional descriptive material, because the claims expressly provide for "performing a financial transaction operation designated by said first common transaction control signals, according to said second transaction control signals."

The Office Action broadly interprets an "automatic transaction apparatus" and a "transaction signal," asserting that Shiomi, at column 7, lines 39-44, and element 11 of Fig. 15 discusses the same. Applicants respectfully disagree with the Office Action's assertion, because Shiomi, at column 7, lines 39-44 merely discusses:

> The application inputting unit 11 is made up of a floppy disk drive, a CD drive, a network interface board, a broadcast receiver, or the like. The application inputting unit 11 receives applications to be executed, and stores the applications into the application storing unit 12.

The application storing unit 12 is made up of an RAM, an ROM, a hard disk, a CD ROM drive, a floppy disk, or the like. The application storing unit 12 stores the applications outputted from the application inputting unit 11, or applications retained beforehand.

In other words, element 11 of Figure 15 of Shiomi merely discusses a computer system and a control signal.

Accordingly, Applicants respectfully submit that an anticipation rejection cannot be based upon Shiomi, because Shiomi fails to disclose each and every feature of the claimed embodiment, including the claimed "a parameter file storing parameters to **convert said first common transaction control signals**, which are common to each apparatus connected to said host and specified by an interface with said host, **into second transaction control signals specific to said middleware layer** ... wherein said middleware layer specific to said apparatus controls said I/O units **performing a financial transaction operation designated by said first common transaction control signals, according to said second transaction control signals**," as recited, for example, in claim 1, because Shiomi merely discusses converting a program into machine code such that a computer may operate on the instructions of the program.

Applicants respectfully submit that the independent claims 9 and 17 patentably distinguish over the cited reference for similar reasons.

Dependent claims are patentably distinguishing at least due to their dependence from the independent claims and/or for reciting patentably distinguishing features of their own. Withdrawal of the rejection of the pending claims and allowance of the pending claims is respectfully requested.

ITEMS 13-16: REJECTION OF CLAIMS 4, 5, 12 AND 13 UNDER 35 U.S.C 103(a) AS BEING UNPATENTABLE OVER SHIOMI, IN VIEW OF EVANS ET AL. (U.S. PATENT PUBLICATION NO. 2004/0131082), HEREINAFTER REFERRED TO AS "EVENS."

The dependent claims 4, 5, 12 and 13 are patentably distinguishing at least due to their dependence from their independent claims and/or for reciting patentably distinguishing features of their own. Withdrawal of the rejection of the pending claims and allowance of the pending claims is respectfully requested.

ITEMS 17-18: REJECTION OF CLAIMS 6 AND 14 UNDER 35 U.S.C. 103(a) AS BEING UNPATENTABLE OVER SHIOMI IN VIEW OF APPLICANT'S ADMITTED PRIOR ART (HEREINAFTER AAPA)

The AAPA merely discusses a Web ATM having a browser to communicate with a remote host. Accordingly, Applicants respectfully submit the AAPA fails to disclose or suggest the claimed "wherein said control unit further comprises a browser communicating with said host on the Web and exchanging said first control signals specified by the interface between said I/O control layer and said host," as recited in claim 6, and the claimed "wherein said receiving step comprises communicating with said host on the Web and exchanging said first transaction control signals specified by the interface with said host," as recited in claim 14.

Accordingly, Applicants respectfully submit that a *prima facie* case of obviousness cannot be based upon Shiomi and the AAPA, because there is no evidence that one skilled in the art would modify Shiomi, the AAPA or a combination of Shiomi and the AAPA to include the claimed "wherein said control unit further comprises a browser communicating with said host on the Web and exchanging said first control signals specified by the interface between said I/O control layer and said host," because the AAPA merely discusses a Web ATM having a browser to communicate with a remote host and because Shiomi merely discusses converting a program into machine code such that a computer may operate on the instructions of the program.

Accordingly, Applicants respectfully submit that the dependent claims recite patentably distinguishing features of their own or are at least patentably distinguishing due to their dependence from the independent claims. Withdrawal of the rejection of pending claims, and allowance of pending claims is respectfully requested.

NEW CLAIM 22:

New independent claim 22 is directed to an automatic financial transaction apparatus, including:

> a plurality of I/O units performing different financial transaction operations designated by first common transaction control signals which are common to each of the plurality of I/O units; and
>
> a control unit controlling one of said plurality of I/O units comprising:
>
> a middleware layer controlling said plurality of I/O units,
>
> an I/O control layer converting said first common transaction control signals into said second transaction control

signals specific to said one of said plurality of I/O units, and
operating said one of said plurality of I/O units based on said
second transaction signals.

Accordingly, Applicants respectfully submit that new claim 22 patentably distinguishes over the art of record. Support for the new claim can be found, for example, in the specification at page 12, line 16 to page 16, line 12.

CONCLUSION

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

STAAS & HALSEY LLP

Date: November 29, 2007   By: _____
                                             Matthew H. Polson
                                             Registration No. 58,841

1201 New York Avenue, NW, 7th Floor
Washington, D.C. 20005
Telephone: (202) 434-1500
Facsimile: (202) 434-1501